

Exhibit 4

Yaniv Taigman

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**In re Facebook Biometric
Information Privacy Litigation**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 In re FACEBOOK BIOMETRIC INFORMATION PRIVACY
6 LITIGATION,

7 CASE NOS. 3:15-cv-03747-JD
8 3:16-cv-00937-JD

9 This Document Relates To:

10 ALL ACTIONS.
11

12 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13 VIDEOTAPED DEPOSITION OF YANIV TAIGMAN

14 Palo Alto, California

15 Tuesday, October 18, 2016
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23 Reported By:
24 Ashley Soevyn,
25 CSR No. 12019

Job No.: 10028056

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC INFORMATION PRIVACY
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ALL ACTIONS.

Videotaped Deposition of YANIV TAIGMAN
taken on behalf of Plaintiffs, at Two Palo Alto
Square, Suite 300, 3000 El Camino Real, Palo Alto,
California, beginning at 8:06 a.m. and ending at
5:13 p.m. on Tuesday, October 18, 2016, before
ASHLEY SOEVYN, Certified Shorthand Reporter No.
12019.

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1 meant by that.

2 Q As co-founder -- well, let's start here.
3 You say "co-founder." What was your role at
4 face.com?

5 A I was the co-founder and CTO.

6 Q CTO. Is that chief technical officer?

7 A Correct.

8 Q All right. And what were your
9 responsibilities as CTO?

10 A There were, like, no formal
11 responsibilities because it was a small company, but
12 I was in charge of the technology that we were
13 researching.

14 Q Okay. And what did you do with respect
15 to that technology? When you say -- strike that.

16 When you say "in charge of the
17 technology," what do you mean by that?

18 A I said "in charge of the research,"
19 component of researching computer vision technology.

20 Q Okay.

21 A It is by researching it, publishing
22 papers, writing code, helping co-workers.

23 Q Uh-huh. And were you generally aware of
24 how that technology would then be used?

25 A Be used by who?

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1 Go ahead.

2 THE WITNESS: People work -- like,
3 engineers. People working on the product.

4 BY MR. RHODES:

5 Q Okay. And, but are there other divisions
6 at Facebook that, for example, design new products
7 on Facebook's websites?

8 A Are there other division in Facebook that
9 design products? Of course.

10 Q Okay. And do any of those products
11 incorporate facial recognition technology? Other
12 than tag suggestions, which you've already testified
13 about.

14 A This is not the way Facebook is
15 organized, but yeah.

16 Q Well, how is Facebook organized?

17 MR. NADOLENCO: Objection. Scope. Form.

18 THE WITNESS: It's very broad question,
19 but so.

20 BY MR. RHODES:

21 Q Well, let's start with: Tell me about
22 the facial recognition team. Who does that consist
23 of?

24 MR. NADOLENCO: Same objections.

25 THE WITNESS: So, in Facebook, there are

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1 engineers, product managers, engineering manager,
2 all kind of people that are changing their focus and
3 organization every couple months or sometimes years.
4 So it's hard for me to, like, enclose all the
5 people, because it's just like it's -- there are,
6 like, many people that can tag a specific code. You
7 have to be more specific about that.

8 BY MR. RHODES:

9 Q Well, let's start with -- start with
10 basics. What is your title at Facebook?

11 A I'm a software engineer.

12 Q Okay. Do you have any other titles, or
13 is that it?

14 A Yeah. I'm -- I'm also a research
15 scientist and a tech lead.

16 Q And I'm sorry. What was that?

17 A Tech lead. Tech lead is like a
18 technology leader.

19 Q Okay. So -- I'm sorry. So you're a
20 software engineer and --

21 A Software, yeah.

22 Q -- research scientists, and then tech
23 lead?

24 A Right. But my official internal title is
25 software engineer.

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1 Q Okay. And, so let's just go through each
2 of those titles. Can you describe the scope of your
3 responsibilities as a software engineer.

4 A As a software engineer, I need to write
5 code and produce quality software.

6 Q Okay. And is there a particular type of
7 code that you're responsible for?

8 A In Facebook, all of the -- each piece of
9 code that was written by a person needs to be -- is
10 responsible for writing it, so.

11 Q Can you -- I missed it. I'm sure the
12 court reporter missed it, too. The HP -- I'm sorry.
13 HP soft code? What did you say?

14 A No, no, nothing like that. I was
15 saying -- it was basically saying that I'm
16 responsible for every single line of source code
17 that I've written, by definition.

18 Q Yes. But is there a division of labor
19 within Facebook where you're responsible for certain
20 source code and someone else is responsible for
21 other source code?

22 MR. NADOLENCO: Form.

23 THE WITNESS: Naturally, I was working in
24 areas with respect to computer vision.

25

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1 BY MR. RHODES:

2 Q Okay. And has that been generally the
3 scope of your source code work for the entire time
4 that you've been at Facebook?

5 A Not the entire time. Recently, I'm
6 working on other stuff as well, but still it falls
7 under computer vision methods. So it could -- it
8 could -- you can say -- you can say, in general,
9 computer vision methods, yes.

10 Q Okay. And does that include applications
11 of facial recognition technology?

12 A Application of facial recognition
13 technology, yes.

14 Q Okay. And -- and you started at Facebook
15 in 2012; is that right?

16 A As an employee, yes.

17 Q As an employee.

18 And was that at the time that face.com
19 was acquired by Facebook?

20 A Around that time, yes.

21 Q Was there -- was there some temporal
22 disconnect between when face.com was acquired and
23 when you started at Facebook?

24 MR. NADOLENCO: Form.

25 THE WITNESS: What do you mean by